

FRANKFURT KURNIT KLEIN & SELZ, P.C.
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Attorneys for Plaintiff Ward Media, Inc.

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

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WARD MEDIA, INC.,	:
	:
Plaintiff,	: No: 07-CV-5470 (BSJ) (DCF)
	:
-against-	:
	: INITIAL DISCLOSURES
	: PURSUANT
	: TO FEDERAL RULE OF
CREOSCOPE MEDIA, INC. and	: CIVIL PROCEDURE 26(a)(1)
FRISCHMAN ENTERPRISES, INC. d/b/a	:
PCSECURITYSHIELD,	:
Defendants.	:
	:
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Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiff Ward Media, Inc. ("Ward Media"), by its counsel, Frankfurt Kurnit Klein & Selz, P.C., hereby provides the following information and initial disclosures based on information known to it at this time. Pursuant to the Federal Rules of Civil Procedure, Ward Media reserves the right to supplement any portion of this disclosure statement with additional information responsive to Rule 26.

I. Individuals Who May Have Discoverable Information

The following individuals may have discoverable information that Ward Media may use to support its prosecution of this matter:

Individual & Address	Scope of discoverable information
Philip Friedman Chief Executive Officer Ward Media, Inc. 141 W. 36 th Street, 20 th Floor New York, NY 10018	<ul style="list-style-type: none"> • Information concerning the agreements between the parties • Information regarding work performed by Ward Media • Information regarding payments and Defendants' default
Craig McGuinn II Chief Operating Officer Ward Media, Inc. 141 W. 36 th Street, 20 th Floor New York, NY 10018	<ul style="list-style-type: none"> • Information concerning the agreements between the parties • Information regarding work performed by Ward Media • Information regarding payments and Defendants' default
Carol Nimphius-Cruz Media Relations Manager Ward Media, Inc. 141 W. 36 th Street, 20 th Floor New York, NY 10018	<ul style="list-style-type: none"> • Information regarding payments and default
Greg Van Horn Chief Executive Officer Creoscope Media, Inc. 1300 NW 17 th Avenue, Suite 260 Delray Beach, FL 33445	<ul style="list-style-type: none"> • Information concerning the agreements between the parties • Information regarding payments and Defendants' default • Information regarding agreements between and corporate organization of Defendants, Creoscope Media, Inc. and Frischman Enterprises Inc. d/b/a/ PCSecurityShield
Arthur Frischman President, PCSecurityShield 601 N. Congress Avenue, Suite 303 Delray Beach, FL 33445	<ul style="list-style-type: none"> • Information concerning the agreements between the parties • Information regarding payments and Defendants' default • Information regarding agreements between and corporate organization of Defendants, Creoscope Media, Inc. and Frischman Enterprises Inc. d/b/a/ PCSecurityShield
Ilona Buksbaum Accounting Department Creoscope Media, Inc. 1300 NW 17 th Avenue, Suite 260 Delray Beach, FL 33445	<ul style="list-style-type: none"> • Information regarding payments and Defendants' default

II. Description and Location of Relevant Documents

Documents in the custody or control of Ward Media include contracts, emails, instant messages and other communications between the parties evidencing the agreements between the parties, payments, and Defendants' default. These documents are located at the offices of Ward Media at 141 W. 36th Street, 20th Floor, New York, NY 10018. Such documents will be made available for inspection and copying or will be provided by Ward Media's attorneys in New York.

III. Computation of Damages

Plaintiff seeks damages for the collection of a debt in an amount to be determined at trial, but not less than the sum of \$113,836.00, plus interest.

IV. Insurance Agreements

At the present time, Ward Media does not believe that there are any insurance agreements that may be liable to satisfy part or all of any judgment that may be entered in this matter.

Dated: September 7, 2007

FRANKFURT KURNIT KLEIN & SELZ, PC

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